

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

TX 1538  
Corresp.CERTIFIED MAIL: RETURN RECEIPT REQUESTED

SEP 1 1983

Mr. James R. Anderson, Manager  
Environmental Affairs  
Olin Chemical Group  
P. O. Box 2896  
Lake Charles, Louisiana 70602

OLIN CORP-SP OLIVER  
780000 607028

Re: Former Olin Site, Wallisville Road  
Houston, Texas

Dear Mr. Anderson:

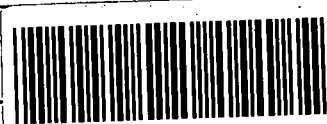
This letter is in response to the draft closure plan submitted by past and present property owners to EPA for the above referenced site and is to present our position in dealing with the known and potential contamination on site. The draft closure plan provides for partial cleanup of the ditches along the north and west boundaries of the site. This plan was prepared, based on existing information. However, the extent of contamination in the ditches, both vertical and horizontal, is not clearly defined and so the proposed remedy may not provide for elimination of any off-site migration. Therefore further sampling will be required.

In addition to the north and west ditches discussed above, we have information which suggests that other portions of the former pesticide site should be examined and sampled to insure that no threat of off-site contamination exists. In order to expedite the data gathering process, EPA contractors will perform the additional sampling for the entire site (including the ditches). It will be possible to split samples should you desire to have them analyzed yourself. Upon receipt of the additional data, an appropriate remedy will be selected. We envision that this remedy will include the proposed remedy, at a minimum, and perhaps additional closure requirements.

As a result of our concern with this site and in an effort to gather all available information to assist in the investigation, the Environmental Protection Agency (EPA) is seeking to obtain certain information regarding the history of the site. As an owner and/or operator of the site, your company may be liable for measures taken to abate a threat of release. Under provisions of Section 104 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. 9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to

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require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances. The EPA has evidence which indicates your company may have engaged in such activities at this site. Therefore, pursuant to the aforementioned statutory provisions, your company is hereby requested to answer the following questions:

1. What is your ownership history of the site?
2. Upon sale of the property, what was the agreement with the buyer concerning responsibilities for site cleanup?
3. What cleanup operations did your company perform prior to or after the sale of the property?
4. What pesticides were handled at the site? What were your pesticide handling and disposal practices on site? Please be specific as to movement and disposition of all soils, and sulfur or pesticide-laden material, dismantling equipment, resurfacing, etc. Do you have engineering plans for your work?
5. Based on your knowledge, what were the disposal practices utilized by Olin on the site?
6. Please provide all data you may have characterizing the pollutants on site.
7. Please provide a complete copy of any report(s) prepared by consultants or your staff concerning the extent of contamination of the site in question (including offsite contamination). Include any associated results of laboratory analysis.

Your answers to these questions and requests must be sent to EPA within thirty (30) calendar days of your receipt of this letter. Under Section 106 of CERCLA, 42 U.S.C. 9606, and Section 3008 of RCRA, 42 U.S.C. 8928, failure to comply with this request may result in an order requiring compliance or a civil action for appropriate relief. Section 106 of CERCLA and Section 3008 of RCRA also provide for civil penalties. The records, reports, and/or information described in this letter must be submitted whether or not you regard part or all of it as a trade secret or confidential. The Regulations found in Subpart B of Part 2 of Title 40 of the Code of Federal Regulations (originally published in the Federal Register on September 1, 1976, and amended in the Federal Register on September 8, 1978) govern EPA's handling of confidential business information. If you desire, you may assert a business confidentiality claim for part or all of the information submitted.

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